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August 22, 2019

## By ECF

SAM SHAPIRO

The Honorable Colleen McMahon Chief United States District Judge Southern District of New York New York, New York 10007

Re: Washington et al. v. City of New York et al., No. 18-CV-12306

Your Honor:

The parties have reached agreement in principle on a settlement of this case and are in the process of finalizing a term sheet, which is subject to the approval of the Albany County Legislature.

We therefore jointly request that the existing stay of the action be extended for an additional 30 days until from September 23, 2019, subject to further additional extensions if the Legislature has not acted by that time, and that all discovery deadlines and deadlines to answer be adjourned *sine die*. The parties also respectfully request that the Court refrain from issuing a 30-day order of dismissal unless and until the Legislature has approved the proposed settlement terms.

Respectfully submitted,

/s/

Douglas E. Lieb

c. All counsel of record (by ECF)